

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA

IN RE:

ALDEN H. ZUHLKE and  
LISA A. ZUHLKE,

Debtors.

---

PHILIP M. KELLY, CHAPTER 7  
TRUSTEE,

Plaintiff,

v.

ALDEN H. ZUHLKE, LISA A. ZUHLKE,  
DEREK A. ZUHLKE and KIMBERLY A.  
ZUHLKE, DILLAN A. ZUHLKE and  
MICHELLE L. ZUHLKE,

Defendants.

Case No. BK 24-40267-BSK  
(Chapter 7)

ADV PRO. No. 24-4011

**DECLARATION OF LAUREN R.  
GOODMAN IN SUPPORT OF  
DEFENDANTS' MOTION TO  
COMPEL**

I, Lauren R. Goodman and states as follows:

1. I am the attorney for Derek A. Zuhlke, Kimberly A. Zuhlke, Dillan A. Zuhlke and Michelle L. Zuhlke in the above-referenced matter. I have personal knowledge of the matters set forth herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Notice of Intent to Serve Subpoena that was served on Plaintiff's counsel in the above-referenced matter.

3. Attached hereto as **Exhibit B** is a true and correct of the Subpoena that was served on Sunshine Ranch Co.

4. Attached hereto as **Exhibit C** is a true and correct copy of the filed Proof of Service with attached executed certified mail return receipt reflecting service by certified mail on Sunshine Ranch Co.

5. Attached hereto as **Exhibit D** is a copy of correspondence received from counsel for Ron Temple on December 27, 2024.

6. Attached hereto as **Exhibit E** is an e-mail string between counsel for Sunshine Ranch Co., and me.

I swear under penalty of perjury that the foregoing statements of fact are true and correct.

DATED this 31<sup>st</sup> day of January, 2025.

/s/ Lauren R. Goodman  
Lauren R. Goodman (#24645)

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2025, I electronically filed the foregoing document with the Clerk of the court using the CM/ECF system which sent notification of said filing to all parties of record, and by first class United States mail and electronic mail to:

Ron Temple  
Fitzgerald, Vetter, Temple, Bartell & Henderson  
1002 Riverside Blvd.  
Norfolk, NE 68701  
[rtemple@FVTlawyers.com](mailto:rtemple@FVTlawyers.com)

/s/ Lauren R. Goodman  
Lauren R. Goodman